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18	NORTHERN DISTRICT OF CALIFORNIA		
19 20 21 22 23 24 25 26 27	RICHARD KADREY, an individual; SARAH SILVERMAN, an individual; CHRISTOPHER GOLDEN, an individual, Individual and Representative Plaintiffs, v. META PLATFORMS, INC., a Delaware corporation; Defendant.	Case No. 3:23-cv-03417-VC STIPULATION AND [PROPOSED] ORDER TO ENLARGE BRIEFING ON DEFENDANT'S MOTION TO DISMISS Trial Date: None Date Action Filed: July 7, 2023	
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COOLEY LLP ATTORNEYS AT LAW

STIP. AND [PROPOSED] ORDER TO ENLARGE PAGE LIMITS ON MOTION TO DISMISS CASE NO.: 3:23-CV-03417-VC Pursuant to Civil Local Rule 7-11 and Paragraph 35 of the Court's Standing Order, Plaintiffs Richard Kadrey, Sarah Silverman, and Christopher Golden (collectively, "Plaintiffs") and defendant Meta Platforms, Inc. ("Meta" or "Defendant") submit this Stipulation ("Stipulation") to enlarge the page limits for the Parties' briefs in connection with Defendant's forthcoming Motion to Dismiss the Complaint ("Motion to Dismiss"). Good cause exists to grant this Stipulation, as discussed below.

- 1. Plaintiffs filed the Complaint (Dkt. 1) in this action on July 7, 2023. The Complaint asserts six claims for (1) Direct Copyright Infringement (17 U.S.C. § 106), (2) Vicarious Copyright Infringement (17 U.S.C. § 106), (3) Removal of Copyright-Management Information and False Assertion of Copyright (17 U.S.C. §§ 1202(a), 1202(b)), (4) Unfair Competition (Cal. Bus. & Prof. Code §§ 17200 *et seq.*), (5) Unjust Enrichment (California common law), and (6) Negligence (California common law).
- 2. Meta intends to file a motion to dismiss under Fed. R. Civ. P. 12(b)(6) directed to all six claims in the Complaint.
- 3. Paragraph 35 of the Court's Standing Order provides that, "[u]nless expressly permitted by the Court, briefs in support of and in opposition to all substantive motions . . . may not exceed 15 pages, and reply briefs may not exceed 10 pages."
- 4. Meta seeks a modest enlargement of the page limits from 15 to 20 pages for Defendant's Motion to Dismiss and Plaintiffs' Opposition respectively (5 extra pages), and from 10 to 12.5 pages for Defendant's Reply (2.5 extra pages).
- 5. Meta believes that good cause exists for this request. Meta's Motion to Dismiss will address each of Plaintiffs' six claims. The arguments directed to each claim will involve discussion of distinct allegations and authorities, and Meta will undertake every effort to streamline them. However, Meta believes its ability to provide the Court with the arguments and authority necessary to appropriately resolve the Motion will be compromised by the default page limit.
- 6. The Parties have met and conferred, and Plaintiffs do not object to Meta's request for the enlargement of page limits.

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1	7. For these reasons, the parties hereby stipulate to and request an order enlarging the			
2	page limits on the parties' briefs from 15 to 20 pages for Meta's Motion to Dismiss and Plaintiffs'			
3	Opposition, respectively, and from 10 to 12.5 pages	Opposition, respectively, and from 10 to 12.5 pages for Meta's Reply.		
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5	5	Respectfully submitted,		
6				
7	7 Dated: September 13, 2023	COOLEY LLP		
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9	9 E	By: <u>/s/ Angela L. Dunning</u> Angela L. Dunning		
10	0	Bobby Ghajar Mark Weinstein		
11	1	Judd Lauter Colette Ghazarian		
12	2	LEX LUMINA PLLC		
13	3	Mark A. Lemley		
14	4	Attorneys for Defendant META PLATFORMS, INC.		
15	5			
16	Dated: September 13, 2023	JOSEPH SAVERI LAW FIRM, LLP		
17	7			
18	8 E	By: /s/ Joseph R. Saveri		
19	9	Joseph R. Saveri Cadio Zirpoli		
20	0	Christopher K.L. Young Kathleen J. McMahon		
21	1	Matthew Butterick		
22	2	Attorneys for Plaintiffs		
23	3	RICHARD KADREY, SARAH SILVERMAN, and CHISTOPHER		
24	4	GOLDEN		
25	5			
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27	7			
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P aw		STIP. AND [PROPOSED] ORDER TO ENLARGE		

COOLEY LLP ATTORNEYS AT LAW PALO ALTO

1	[PROPOSED] ORDER	
2	PURSUANT TO THE STIPULATION, IT IS SO ORDERED:	
3	1. The page limit for Defendant's forthcoming Motion to Dismiss and any Opposition	
4	by Plaintiffs is 20 pages; and	
5	2. The page limit for the Reply in support of Defendant's Motion is 12.5 pages.	
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7	Dated:, 2023	
8	HON. VINCE CHHABRIA UNITED STATES DISTRICT JUDGE	
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1	ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)		
2	I hereby attest that I obtained concurrence in the filing of this document from each of the		
3	3 other signatories. I declare under penalty of perjury that the foregoing is	other signatories. I declare under penalty of perjury that the foregoing is true and correct.	
4			
5	Dated: September 13, 2023 COOLEY LLP		
6	6 /s/ Angela Dunnin	ng	
7	7 Attorneys for Defend Meta Platforms, Inc.	ant	
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